

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID REID, et al.,

Defendants.

Case No.: CR05-1849 JH

(EXPEDITED RULING REQUESTED)

**UNOPPOSED MOTION BY DEFENDANT DAVID REID TO
BE PERMITTED TO REMAIN OUT OF STATE UNTIL JANUARY 5, 2006**

Defendant, David Reid, by and through undersigned counsel, hereby moves this Honorable Court to enter an Order permitting him to continue to remain out of the state of Arizona until January 5, 2006. The grounds for this Motion are:

1. Pursuant to the current terms and conditions of release, Mr. Reid is prohibited from traveling out of the state of Arizona unless approved by the Court.
2. On November 29, 2005, this Honorable Court entered an order allowing Mr. Reid to travel to Oregon from November 28, 2005 until December 16, 2005.
3. Mr. Reid's daughter resides in Oregon and was involved in a serious automobile accident on December 6, 2005. As a result, Mr. Reid's daughter has been in the Intensive Care Unit at Oregon Health Science University and regained consciousness two days ago. However, her medical condition has not stabilized.

4. Mr. Reid would like to remain in Oregon to care for his daughter and insure that if her health deteriorates more, that he is with her. As such, Mr. Reid would like to remain in Oregon until January 5, 2006.

5. Undersigned counsel contacted Assistant United States Attorney General James Braun on December 13, 2005 and he stated that he would follow the recommendation of the Pre-trial Services Agency Officers Sandra Avila Toledo and Jose Valencia.

6. Undersigned counsel contacted Mr. Reid's assigned Pre-trial Services Agency Officer in New Mexico, Sandra Avila Toledo, on December 14, 2005 and she indicated that she had no objection to Mr. Reid remaining in Oregon until January 5, 2006.

7. Undersigned counsel contacted Mr. Reid's assigned Pre-trial Services Agency Officer in Arizona, Jose Valencia, on December 13, 2005 and he stated that he had no objection to Mr. Reid's request to remain in Oregon until January 5, 2006.

Based on the foregoing, Mr. Reid requests this Honorable Court enter an Order permitting him to remain in Oregon until January 5, 2006.

RESPECTFULLY SUBMITTED this 14th day of December, 2005.

/s/ electronically signed

ZUBAIR ASLAMY
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I hereby certify that a true and correct copy of the foregoing was filed electronically with the court and faxed to the Assistant United States Attorney and mailed to the following this 14th day of December, 2005.

/s/ electronically signed

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